

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., <u>et al.</u> , ¹)	Case No. 01-01139 (JKF)
)	Jointly Administered
)	
Debtors.)	Related to Docket No. 14929
)	April 13, 2007 Agenda Item No. 3
)	May 2, 2007 Agenda Item No. 14

**CERTIFICATION OF COUNSEL REGARDING
INTERROGATORIES AND AFFIDAVIT OF COMPLIANCE ON DEBTORS'
MOTION TO COMPEL COMPLIANCE WITH THE CONSULTING EXPERT ORDER**

The undersigned hereby certifies that:

1. On March 21, 2007 the Debtors filed their Motion to Compel Compliance with the Supplemental Order Regarding Motions to Compel Claimants to Respond to the W. R. Grace & Co. Asbestos Personal Injury Questionnaire [Docket No. 14929] (the "Motion")

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

2. The Motion was heard at the April 13, 2007 hearing, and the Court ruled as follows: 1) that the parties were to negotiate appropriate interrogatories to address the discovery issues raised in the Motion and addressed by the Court on April 13, 2007; 2) that Rust Consulting, Inc. was required to compile any information received pursuant to the Consulting Expert Order up to and including April 13, 2007 into the Navigable Database but that no further information received after that date needed to be included in the database; and 3) that any law firms that have not filed Fed. R. Bankr. P. 2019 statements must to do so without further delay.

3. The Debtors prepared an order reflecting the Court's rulings along with draft interrogatories and an affidavit of compliance that could be supplied in lieu of answering the interrogatories in appropriate circumstances and circulated the order, interrogatories and affidavit of compliance to counsel for all of the Official Committees, counsel for the Future Claimants Representative, and counsel to certain plaintiffs' law firms subject to the Consulting Expert Order (the "Objectors").

4. On April 30, 2007 counsel for all parties participated in a "meet and confer" with respect to the draft interrogatories and reviewed and considered revisions suggested by counsel for one of the Objectors. The parties, however, were not able to reach agreement with respect to the form of the interrogatories.

5. Attached hereto are the draft interrogatories and draft affidavit of compliance proposed by the Debtors. Also attached is a draft order approving the form of those documents and addressing the other matters discussed at the April 13, 2007 hearing.

6. Debtors believe that all of the information requested in the interrogatories is necessary and appropriate and consistent with the Court's rulings on April 13, 2007.

7. Accordingly, the Debtors respectfully request that the Court approve the form of the interrogatories submitted by the Debtors hereto along with the corresponding affidavit of compliance and enter the attached Order related thereto.

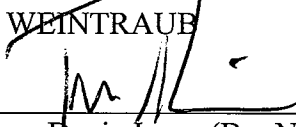
Dated: May 1, 2007

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